

Comments to the Prescott General Plan Committee from the Citizens Water Advocacy Group

Howard Mechanic, Chair of the Public Policy Committee

September 5, 2011

We have reviewed the Water Element Section of the 2003 General Plan and the recent highlighted comments from staff in the packet for your September 14th meeting. Below are our initial comments:

10.1

“Under the Arizona Groundwater Code of 1980, the State of Arizona established five Active Water Management Areas to ensure that groundwater would not be depleted beyond the level being recharged, a condition known as ‘safe yield.’”

Comment: The language “to ensure” is not accurate. The State in no way is ensuring groundwater would not be depleted beyond the level being recharged. In fact, the rate at which the Prescott Active Management Area (AMA) is depleting groundwater has increased since we were declared “out of safe yield” in 1999. The overdraft is not expected to decrease much unless the local jurisdictions in the AMA develop and implement a plan to reach safe yield. Recognize that there are no regulatory penalties for not achieving safe yield and the state has no means to require a plan to achieve safe yield. Also, only four of the five AMAs have safe yield as a goal. The other has planned depletion as a goal.

The aquifer receives treated effluent in addition to natural precipitation. It also receives man-induced (recharged) surface water, which many may or may not considered to be natural precipitation.

“Depleted beyond the level being recharged” is poor wording. We suggest using the legal definition or something similar.

The AWS rules do not allow any AMA groundwater for new subdivisions. The rules require the use of alternative water for new subdivisions. Regarding drought conditions, “could be impeded” should be changed to “would be made more difficult.”

FIGURE 10-2 Predicted Change in Aquifer Storage With Imported Supplies

Comment: Contrary to the predictions in the 2003 General Plan that the overdraft will have decreased by 2011, the overdraft has increased to around 11,000 acre-feet per year. Significant reductions in the overdraft are unlikely in the next five to ten years, especially if there is no coordinated AMA-wide safe yield plan enacted soon.

10.2.2

The plan should note that 46% of the 8068 AFY of water is contractually committed to PV. It should also note that potential HIA water from the BCWR is unofficially estimate at about 3,600 AFY and, if used for safe yield or mitigation, is not committed in any portion to PV.

10.3.1 Effluent Supplies

“Additional methods to optimize this resource include . . . periodic review of effluent sale rates . . .”

Comment: The price of treated effluent has not been reviewed for at least 13 years (maybe close to 20 years -- check with staff for exact date). The price charged to many customers is now vastly below the market rate or replacement rate of that water. The City should establish a new price structure for the sale of effluent as soon as possible, and not wait for completion of a new long-term water management plan (which is already two years behind original schedule). The City has raised the price for potable water many times in the last decade. There was no need to wait for a management plan for those price increases. In the same way, there is no need to wait to review the price of treated effluent. As the staff mentioned, most of the effluent is sold under long-term contracts. However, some of the effluent sales are not under long-term contract and can be adjusted.

Underpricing of treated effluent discourages reasonable conservation efforts. When prices are raised to a reasonable level, we can expect users of the valuable treated effluent to institute stronger conservation measures. Also, since Prescott’s Water and Wastewater Funds are operated as enterprise funds geared to cover their own expenses, other users are paying higher prices to subsidize the cost of effluent.

10.3.3 Additional Water Supplies

Figure 10-5 Conservation And Augmentation Scenario Prescott Active Management Area

Comment: In addition to the need for an update, the table showing the water balance of our AMA does not include the natural outflows from our AMA, including flows to the Big Chino sub-basin of the Verde River and the Agua Fria basin. These outflows are approximately 4100 acre-feet per year (according to an Arizona Department of Water Resources (ADWR) Draft Demand and Supply Assessment report for the AMA dated September 2010). Therefore, the final water balance is approximately 4000 acre-feet less than what is listed. We suggest you use the ADWR format for annual water budgets.

...

“Thus, imported water, by policy, should be treated as a reserve to maintain a safe yield position. As such, it should be used in place of local water and not to support still further urbanization.”

Comment: Prescott's Council has decided that 80% of the cost of the Big Chino Project is to be paid by new growth. The other 20% of the cost is to be paid by all water users through increased water rates because part of the project's water is theoretically intended for safe yield. However, the City has never officially decided how much, if any, of the Big Chino water will go to help us reach safe yield. Because of voter approval of Proposition 400, The Reasonable Growth Initiative, the City must apply all effluent from all annexation areas over 200 acres to permanent recharge in our AMA.

10.4 PUBLIC EDUCATION AND REGIONAL COORDINATION

"The proper protection, and management of this important resource (including imported supplies) will require cooperation and planning of all of the entities and individuals who impact it. The City anticipates the need to continue to work with regional water forums and implement a regional coordination strategy."

Comment: No regional coordination strategy has been established. Currently, the local AMA jurisdictions are not even discussing the development of a plan to reach safe yield. The General Plan should include wording like the following to show we are taking an active role in developing a plan to reach safe yield:

The City of Prescott supports the goal for the Prescott Active Management Area (AMA) to reach safe yield by 2025, and to maintain safe yield thereafter. However, Prescott alone cannot take actions to develop and implement a plan for the AMA to reach safe yield. In order to reach safe yield, it is important for all the AMA jurisdictions to work to develop a plan. As the largest user and political entity, Prescott should provide leadership in getting the AMA parties together for the purpose of developing and implementing a plan to reach safe yield.

10.4 WATER RESOURCES GOALS AND STRATEGIES

Goal 1

Comment: Replace "Provide a reliable water..." With "Reduce water demand and aquifer overdraft by employing water conservation measures."

Strategy 1.2

Comment: The city's water losses are highly variable and require investigation.

... **Strategy 1.3** Review additional conservation measures for possible addition to the City's existing Water Conservation Program.

Comment: Mayor Simmons established a City Water Conservation/Safe Yield Committee, which developed many effective conservation strategies and programs during his administration and part of Mayor Wilson's administration. However, this committee no longer exists. Such a committee should be re-established and kept in operation as an advisory committee to the City and Council.

Strategy 1.4

Comment: The tiered rate structure can be made steeper.

Goal 3. Develop Additional Water Supplies for the city.

Strategy 3.1 Pursue the importation of water resources in sufficient quantities to reduce depletion of local water reserves and achieve “safe yield”.

Comment: Neither the City nor any single user entity can achieve safe yield by itself. Although at times the city representatives have stated that the Big Chino Water Ranch (BCWR) will supply water for growth and safe yield, the city has not committed any of the BCWR water to achieve safe yield. The city, through a resolution, however, has committed the Historically Irrigated Acreage portion of the water from the BCWR to either safe yield or mitigation or both, and that water is insufficient to do either task entirely.

The City can reduce its use of AMA groundwater, and thereby help us reach safe yield. But that action is not a replacement for the AMA reaching and maintaining safe yield.

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